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Attorney for Plaintiff RAFAEL ARROYO, JR.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RAFAEL ARROYO, JR.,

Plaintiff,

v.

BANK OF AMERICA, NATIONAL
ASSOCIATION; and Does 1-10,

Defendants.

) **Case:** 8:19-CV-00389-AG-DFM

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DISCOVERY MATTER

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Plaintiff's Notice of Motion & Motion:

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**(1) Compelling Initial Disclosures;
or, in the alternative,**

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**(2) For an Order Excluding Non-
Disclosed Witnesses and Documents;**

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Date: September 5, 2019

Time: 10:00 a.m.

Courtroom: 1053

Magistrate Judge: Hon. Douglas F.
McCormick

1 **TO ALL PARTIES AND TO THEIR ATTORNEY(S) OF RECORD:**

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3 PLEASE TAKE NOTICE that on, August 23, 2019, at 10:00 a.m., in COURTROOM no.
4 1053 of the Ronald Reagan Federal Building, located at 6B,411 W 4th St, Santa Ana, CA,
5 92701, Plaintiff RAFAEL ARROYO, JR. will and hereby does move this Court for an order
6 compelling Defendant to provide Initial Disclosures. In the alternative, Plaintiff respectfully
7 requests this Court issue an Order to Show Cause as to why an Exclusion Order should not be
8 entered as to Defendants.

9 This Motion is brought on the grounds that the Initial Disclosures are a required,
10 compulsory part of litigation and Defendants' refusal to provide Initial Disclosures, or meet and
11 confer regarding their absence, is without substantial justification.

12 This Motion to compel Initial Disclosures will be based on the arguments presented in
13 Plaintiff's Memorandum of Points and Authorities, the Declaration of Jennifer A. McAllister,
14 the Exhibits filed concurrently with this motion, and oral argument, if any.

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16 Dated: July 25, 2019

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19 By: /s/ Jennifer A. McAllister
20 Jennifer A. McAllister
21 Attorneys for Plaintiff
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